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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
Administration of the)
North American Numbering Plan)

92-237
DA 91-1307

REPLY COMMENTS OF AMERICAN TELEPHONE
AND TELEGRAPH COMPANY

Pursuant to the Commission's October 18, 1991 Public Notice,* American Telephone and Telegraph Company ("AT&T") submits these reply comments in support of the National Association of Regulatory Utility Commissioners' ("NARUCs'") petition for a notice of inquiry concerning the administration of the North American Numbering Plan ("NANP").

The overwhelming majority of commenters (including Bellcore, the current NANP Administrator) support NARUC's request that the Commission begin an inquiry into the NANP administration process and number and code assignment procedures.** The comments also confirm the importance of NANP administration to the

* Public Notice, DA 91-1307, 6 FCC Rcd. 6070 (1991). A list of other parties submitting comments in this proceeding, and the abbreviated designations used herein, is attached as Appendix 1.

** See, e.g., Allnet, p. 1; Bellcore, p. 5; Centel, p. 4; McCaw, p. 4; MCI, p. 9; MFS, p. 5; NTCA, p. 2; D.C. PSC, p. 3; Telocator, p. 11; TCG, p. 1; Unitel, p. 1.

industry, and for the most part, call for a comprehensive review of current NANP issues, as well as future industry developments that must be addressed under the NANP.*

Only some local exchange company commenters oppose NARUC's request, or suggest that if a notice of inquiry is issued, its focus should be narrow.** They assert that NANP administration issues have been and are being adequately addressed by Bellcore and that a notice of inquiry at this time might interfere with ongoing NANP activities.*** This unsupported assertion and speculative concern provides no basis for denying NARUC's request or for limiting the scope of the inquiry the Commission should conduct.

First, as Centel explains (p. 3), work in progress to address numbering code issues should be continued during the Commission's inquiry. As part of its inquiry, the Commission can request information "describing which issues are being examined, the progress made to date, and the schedule for resolving those issues" (id.). With this information, the Commission can

* See, e.g., McCaw, pp. 1-3; MCI, pp. 3-4; MFS, pp. 5-6; NTCA, p. 2; D.C. PSC, p. 2; Rochester, p. 3; Telocator, p. 1; TCG, p. 2.

** See, e.g., Ameritech, p. 1; BellSouth, pp. 1-2; GTE, p. 11; NYNEX, p. 3; Pacific Companies, p. 1; SWBT, p. 1; UTI, pp. 1-2; USTA, pp. 3-4; U S WEST, pp. 2-6.

*** See, e.g., Ameritech, p. 14; NYNEX, pp. 5-6; U S WEST, pp. 2-3.

determine "what, if any, steps it should take to prevent waste and ensure the efficient and non-discriminatory allocation of" valuable numbering code resources (id.). This process will assure that a Commission inquiry does not interfere with ongoing NANP activities that the industry agrees are effective to resolve identified numbering code concerns.

Further, claims that the Commission should exclude particular issues from its notice of inquiry (see, e.g., BellSouth, pp. 3-6; GTE, pp. 4-7; NYNEX, p. i; SWBT, p. 3; VTI, p. 4; U S WEST, pp. 2-6), or otherwise narrowly define the scope of the inquiry, simply misperceive the purpose of the inquiry. NARUC has not requested that the Commission initiate a rulemaking proceeding, or proposed any specific rules. Rather, NARUC has requested that the Commission seek information and comment "concerning the administration of the North American Numbering Plan."*

Only by allowing interested parties to provide information on all issues affecting their participation in or interaction with the NANP can the Commission develop the detailed and complete record that will allow it to formulate and adopt appropriate NANP administration and conflict resolution procedures, and formulate any further

* Public Notice, 6 FCC Rcd. at 6070.

action appropriate to emerging issues.* Through the implementation of these procedures, the Commission can ensure the impartial and effective NANP administration that is critical to meet the evolving requirements of the competitive telecommunications industry. Such procedures will result in the nondiscriminatory availability of adequate numbering resources to all carriers, facilitate the continued provision of quality services to all customers, and encourage the development of new services, for example, personal communications services, which may require nontraditional number assignment independent of location and the identification of the service provider.

* * *

For all these reasons, the Commission should grant NARUC's petition and establish a comprehensive

* See AT&T, p. 4.

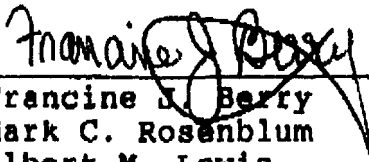
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notice of inquiry concerning future administration of the
NANP and other vital numbering and code resources.

Respectfully submitted,

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January 17, 1992

CERTIFICATE OF SERVICE

I, Alice Popelka, do hereby certify that a true copy of the foregoing Reply Comments of American Telephone and Telegraph Company was served this 17th day of January, 1992, by United States mail, first class, postage prepaid, upon the parties listed on the attached service list.



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Dated: January 17, 1992

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